

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: XO Communications, Set #1

DATED: April 12, 2002

ITEM: XO-VZ-1-1 Please refer to page 12 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon MA uses the following security methods for providing CLECs' access to their collocate space, . . . (2) electronic card reader access systems . . ."

- (a) What is the procedure used by Verizon MA if a CLEC reports its access cards do not work?
- (b) What is the average time required by Verizon MA to fix an access card that does not work?

REPLY: a) The CLEC card user would call the Verizon Collocation Care Center (CCC) at 1-800-483-4116 to report that his access card does not work. The CCC would then assign a ticket number and perform a database scan to verify validity of the card and CLEC user. The CCC refers this matter to Verizon Corporate Security (VCS) to determine whether the cause of the problem is the access card or the access card reader.

If the access card is malfunctioning, VCS reprograms the access card the Card Reader Access System ("CRAS") in coordination with the CLEC card user. If the access card reader is malfunctioning in the central office, VCS schedules its repair. Once this is determined, the CCC notifies the CLEC and provides the estimated time for repair. The CCC subsequently verifies with the CLEC user that the access is operational, and closes the initial ticket.

REPLY: XO-VZ 1-1
(cont'd)

- b) A malfunctioning access card can be reset in approximately four or less business hours, depending on the availability of the CLEC card user. The average time to repair a malfunctioning access card reader is one business day.

VZ #13

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Respondent: Lynelle Reney

Title: Director

REQUEST: XO Communications, Set #1

DATED: April 12, 2002

ITEM: XO-VZ-1-2 Please refer to page 16 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has documented such violations as unauthorized entry into CO areas outside of the CLEC's collocated equipment resulting from unauthorized access to a CLEC's cage, theft and vandalism of CLEC equipment resulting from unauthorized access to a CLEC's cage . . ."
Please describe the process that Verizon MA follows after it documents any violations described.

REPLY: See Verizon MA's Reply to AG-VZ-1-1 for a description of the overall process and available documentation, as provided in voluminous attachments to that reply.

The Verizon Collocation Care Center (CCC) receives calls of this type, assigns a ticket number, and refers them to Verizon Corporate Security (VCS) for investigation. VCS may then dispatch an investigator to the actual location to review the physical conditions and interview any available witnesses. VCS reports its findings to the CCC, which then notifies the CLEC. In cases of theft or vandalism to the CLEC's collocation arrangement, the CLEC is advised to file a police report. In addition, VCS may monitor sites for repeat incidents and, if a pattern is identified, may take additional steps, such as site surveillance, camera installation, etc.

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Respondent: Francesco Matera

Title: Director

REQUEST: XO Communications, Set #1

DATED: April 12, 2002

ITEM: XO-VZ-1-3 Please refer to page 17 of the April 5, 2002, Panel Testimony, wherein the panelists state, "CLEC personnel may also have less incentive to exercise care with Verizon's or other collocated carriers' equipment, or may be less trained or less familiar with the CO environment and the potential incidental harm to the various types of CO equipment." Please provide all facts on which Verizon MA relies to make this claim.

REPLY: In the context of that Panel Testimony (p.7), Verizon MA defines CLEC personnel as including its own employees, contractors and vendors. Verizon MA's statements are based on its experiences with CLEC personnel, as reflected in the Attachments to Verizon MA's Reply to AG-VZ-1-1.

Many CLECs have chosen to use non-approved/non-certified contractors in their collocation facilities and collocation common areas, resulting in increased incidents of standards and work practice violations within Verizon's central offices (CO). Because the non-approved contractors and vendors often do not know the CO requirements, they may hastily finish a job, causing problems with the office infrastructure. This can include careless or negligent acts, such as leaving installation debris after completing a job (an obvious safety and fire code violation and an expense to Verizon for removal), to life threatening safety violations (such as leaving fused and unterminated power cables) and network hazards (such as removal of fuses without proper authority or clearance). Likewise, even when some CLECs have their own technicians perform work in their collocation facilities, the same violations have occurred due to inexperience or lack of

REPLY: XO-VZ-1-3
(cont'd)

knowledge of applicable CO standards and requirements. As stated in Panel Testimony, CLEC personnel are not employed by Verizon – and thus not directly accountable to Verizon CO supervisors.

VZ #15

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D.T.E. 02-8

Respondent: Francesco Matera

Title: Director

REQUEST: XO Communications, Set #1

DATED: April 12, 2002

ITEM: XO-VZ-1-4 Please refer to page 29, of the April 5, 2002, Panel Testimony, wherein the panelists state, "Based on this preliminary criteria, there is a handful of Massachusetts COs that would meet this criteria and be designated as 'critical,' providing *only* for virtual collocation arrangements for security reasons." Please provide a list of the handful of COs that Verizon MA would designate as critical as well as the factor that applies to designate the CO as critical.

REPLY: Verizon MA has not identified the specific Massachusetts COs that would be designated as "critical," and then limited to virtual collocation arrangements. The preliminary criteria described in Verizon MA's panel testimony is intended as the basis for the Department and the Company to develop a framework for identifying those critical offices. Verizon MA anticipates that a small number of COs (*e.g.*, only a handful) would be designated as critical.

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Respondent: Francesco Matera

Title: Director

REQUEST: XO Communications, Set #1

DATED: April 12, 2002

ITEM: XO-VZ-1-5 What process does Verizon MA propose to use when it desires to designate additional COs are “critical”?

REPLY: Although Verizon MA anticipates that the list of “critical” COs will remain relatively constant over time, the Company would work with the Department on an ongoing basis to determine whether other COs should be added to that list.

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D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: XO Communications, Set #1

DATED: April 12, 2002

ITEM: XO-VZ-1-6 Please refer to page 30 of the April 5, 2002, Panel Testimony, wherein the panelists state, "Verizon has not determined the costs associated with its proposed collocation security plan."

- (a) Please provide the total costs for all Massachusetts COs for CLECs to implement Verizon MA's proposed collocation security plan.
- (b) Please provide the average cost per physical collocation for each type of collocation (caged, SCOPE, CCOE, adjacent, and shared) for CLECs to implement Verizon MA's proposed collocation security plan.
- (b) Please provide the costs associated with XO's collocation arrangements to implement Verizon MA's proposed collocation security plan (provide as a proprietary response).

REPLY: Verizon MA objects to this request on the grounds that it is overly broad and unduly burdensome and seeks information that is irrelevant, immaterial and beyond the scope of this proceeding, as established by the Hearing Officer at the Department's February 25th Procedural Conference (Tr. 1:14-15).

Notwithstanding these objections, Verizon MA responds to this request as follows:

The information being requested is not readily available and would require an extensive special study.

